

Response ID ANON-B3JU-DS5S-K

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**
Submitted on **2019-05-09 15:46:27**

About You

What is your name?

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On behalf of:

Mrs J. Ironside/ Midstocket Development Company Ltd

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2 Settlement Strategy

Question 1 New Housing Sites

Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?:

Guttrie Hill West, this is a small site that would be suitable for housing as set out in the supporting statement

Question 2 Housing Allowances Beyond 2032

Is there a need for us to identify further Housing Allowances or sites for the period beyond 2032?:

Question 3 Brownfield and other Opportunity Sites

Are there any further brownfield or other opportunity sites which would be suitable for redevelopment?:

Question 4 New Healthcare Facilities

Do you have any comments on these sites? Are there any other sites in these areas that we should be considering?:

3 Aberdeen City Centre and the Network of Centres

Question 5 City Centre Boundary

Do you agree the Local Development Plan should modify its City Centre boundary to match the City Centre boundary shown in the City Centre Masterplan?:

Question 6 City Centre Masterplan Intervention Areas

Do you agree that the City Centre Masterplan intervention areas should be identified as opportunity sites within the Local Development Plan?:

Question 7 City Centre Retail Core

Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?:

Question 8 Union Street Frontages

Should the Union Street Frontages percentages be reviewed? Do the current target percentages ensure there is a balance between a strong retail focus and allowing for other uses? What other uses should we allow on the retail core area of Union Street:

Question 9 Out of Town Retailing

Should we direct high footfall uses to existing centres including the City Centre? Should we consider new out of town retail parks? What would the impact of these be on Union Street and the City Centre, and Aberdeen's network of centres?:

Question 10 Commercial Leisure Uses

Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?:

Question 11 City Centre Living

How can we encourage more people to live in the City Centre? Would a document outlining the principles which need to be applied in converting a building into residential use be helpful?:

MAIN ISSUE 1 Living in the City Centre

Should we include a policy in the Local Development Plan supporting residential development in the City Centre, including the conversion of upper and basement floors of premises to provide residential accommodation?:

Not Answered

Question 12 Residential Development in the City Centre

Are there any other locations within the City Centre where residential accommodation could be provided?:

MAIN ISSUE 2 A 24-Hour City

Should 24-hour activities in Aberdeen be supported and encouraged to grow, especially in the City Centre? Could this be achieved through policy?:

Not Answered

Question 13 Encouraging the Creative Arts

What can we do to support and encourage the creative sector to ensure a range of distinctive experiences so that Aberdeen City Centre is like no other place?:

Question 14 Proposals for Creative Arts

Are there other buildings or areas within Aberdeen that could accommodate the existing, and support an emerging creative sector for desk-based and studio-based artists?:

Question 15 Percent for Art

To ensure Aberdeen City Centre retains its distinctiveness, should developments with construction costs of £1 million or over be required to allocate at least 1% of construction costs for the inclusion of art projects in a publicly accessible/ visible place or places within the development?:

MAIN ISSUE 3 Support for Visitor Attractions

To support our existing visitor attractions should Aberdeen have a policy about protecting and growing visitor attractions?:

Not Answered

4 Quality Places

MAIN ISSUE 4 Minimum Internal Space Standards for New Residential Development

How can we ensure that new residential development delivers an adequate amount of internal floor space for future occupants?:

Not Answered

Question 16 External Space Standards

Do you think that the amenity spaces currently delivered are of a sufficient quality? Should we strive for a better quality/ quantity of private/ semi-private residential amenity space across the city and refuse planning permission to proposals which do not meet our high standards? What standards would you like to see set for new dwellings, flats, and conversions in respect of quality and quantity of external amenity space?:

Question 17 Natural Environment

Do you agree that the proposed list of policies for Natural Environment gives a clearer and more coherent structure than at present?:

Question 18 Food Growing

How can the Local Development Plan support the delivery of food growing projects in the City? Do you think food growing should be included in the next Plan by way of a new policy, or through existing policy and guidance?:

5 Transport and Infrastructure

Question 19 City Centre Parking

Should we reduce car parking in the City Centre to support the City Centre Masterplan? If so, how?:

MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

How best can we encourage the provision of infrastructure to support changes in transport technologies? :

Not Answered

Question 20 Digital Infrastructure

Should high speed broadband be mandatory in all new residential developments with 5 or more units? Do you wish to suggest any other proposed changes to the Digital Infrastructure and Telecommunications Infrastructure policies?:

Question 21 Developer Obligations and Infrastructure Delivery

Do we need to change our approach to securing developer obligations for future development proposals?:

6 Resource and Business Policy

MAIN ISSUE 6 Low and Zero Carbon Generating Technologies and Water Efficiency

Should the requirement of existing Policy R7 be changed?:

Not Answered

Question 22 Low and Zero Carbon Generating Technologies and Water Efficiency

What methodology should the Council use in calculating compliance with Policy R7, specifically how should the target of reducing carbon dioxide levels be calculated?:

Question 23 Solar Farm Developments

Do you agree that Solar Farms should be supported within the Council's policy on Renewable and Low Carbon Energy developments, and should specific guidance be included within Policy R8?:

MAIN ISSUE 7 Heat Networks

Should we include a policy in the Local Development Plan supporting the development of Heat Networks within the City?:

Not Answered

Question 24 Supporting Business and Industrial Development

Should we carry forward our current policy approach to safeguarding existing business and industrial areas from other development pressures into the next Local Development Plan?:

MAIN ISSUE 8 West End Office Area

Should the policy support a mix of uses in the West End Office Area? If so, what types?:

Not Answered

8 Sustainable Mixed Communities

MAIN ISSUE 9 Inclusive Housing Mix (Housing for the Elderly and Accessible Housing)

How can the Local Development Plan ensure a greater mix of housing types is achieved in new developments?:

Not Answered

MAIN ISSUE 10 Residential Care Facilities

How should the Local Development Plan cater for proposals relating to Residential Care Facilities?:

Not Answered

MAIN ISSUE 11 Student Accommodation

How can the Local Development Plan cater to proposals relating to student accommodation?:

Not Answered

MAIN ISSUE 12 Houses in Multiple Occupation

How can the Local Development Plan support sustainable mixed communities, with regards to HMOs?:

Not Answered

Percentage limit of HMOs in each area:

Please explain why you chose your answer:

Geographical boundary of each area:

Please explain why you chose your answer:

Threshold for when planning permission is required for a HMO:

Please explain why you chose your answer:

Question 27 Community Planning

Is there anything else that the Local Development Plan can do to support the objectives of the LOIP or the aims of Community Planning?:

Question 28 Changing Places Toilets

Should large new developments that require public access provide Changing Places toilets? What types of venues should provide them?:

Appendix 1 Proposed Draft New Policies

Policy D2 Amenity

Do you have any comments on the policy?:

Policy D5 Advertisements and Signage

Do you have any comments on the policy?:

Policy D8 Shopfronts

Do you have any comments on the policy?:

Policy D9 Windows and Doors

Do you have any comments on the policy?:

Policy H4 Housing Mix and Housing for Particular Needs

Do you have any comments on the policy?:

Policy H8 Residential Care Facilities

Do you have any comments on the policy?:

Policy H9 Student Accommodation Developments

Do you have any comments on the policy?:

Policy H10 Houses in Multiple Occupation

Do you have any comments on the policy?:

Policy NC9 City Centre Living

Do you have any comments on the policy?:

Policy NC10 24-hour City

Do you have any comments on the policy?:

Policy NC11 Visitor Attractions and Facilities

Do you have any comments on the policy?:

Policy NC12 Public Art Contribution

Do you have any comments on the policy?:

Additional Documents

Please include comments on other documents below:

Please include comments on other documents below::

Additional Files

If you have further information you would like to provide you may upload it here.:

Main Issues Report Response West v2.pdf was uploaded



Main Issues Report Response

Guttrie Hill West

IAAB16-0051

Mrs J. Ironside/ Midstocket Development Company Ltd

April 25, 2019

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1 INTRODUCTION

This report responds to the Aberdeen City Council Main Issues Report (MIR) and has been prepared on behalf of Mrs J. Ironside/Midstocket Development Company Ltd who previously submitted a development bid through the call for sites in preparation of the Local Development Plan (LDP).

The submission is in relation to land on the outskirts of Peterculter at Guthrie Hill West, the proposal is to develop a small cluster of five residential dwellings on a former quarry site. The site was subsequently recommended as undesirable with several constraints identified in the MIR. This submission seeks to alter the Council's conclusion and ultimately have the site allocated in the upcoming LDP.

This report will briefly outline the proposal for the site once again, giving a site description as well as an outline of the proposal. Relevant national, regional and local policy will be cited and mitigation provided to address the concerns highlighted regarding the proposal.

2 SITE DESCRIPTION AND BACKGROUND

The site in question is located on the northern outskirts of Peterculter, 750 metres from North Deeside Road. It sits immediately adjacent to Culter House Road and to the north of the golf course at Kippie Lodge. The line of Aberdeen Western Peripheral Route (AWPR) runs 300 metres to the east.

The site itself is south facing and is wooded with a mixture of species including Silver Birch, Rowan and Scots Pine. It is currently unused, although a network of beaten footpaths exist.

Historically it has been used for localised quarrying and evidence of this can be seen in both historical Ordnance Survey maps and current photographs.

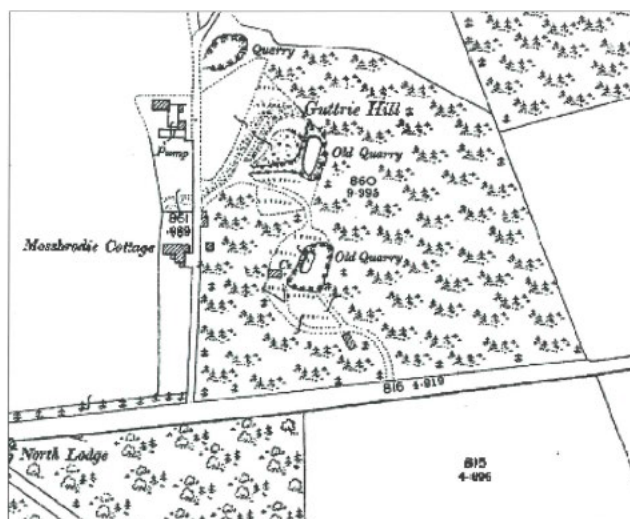


Figure 1: Ordnance Survey Extract (1900)



Figure 2: Ordnance Survey Extract (1959)

Examination of the Ordnance Survey map dated 1900 indicates evidence of quarrying on the site, as illustrated in Figure 1. Quarrying activity can still be seen to be taking place on the 1959 OS plans in Figure 2.

Examination of the site today indicates that evidence of the historical quarrying activities remains, Figures 3 and 4 show the site today with remains of the former quarrying activities still prevalent.

The site area is in the ownership of the proposer and is approximately 4ha.



Figure 3: Current Day Photograph of Site Showing Former Quarries on Site



Figure 4: Current Day Photograph of Site Showing Shed on Site

3 PROPOSED DEVELOPMENT

The proposal is for a small cluster of five dwellings to be constructed at the south of the site utilising the former quarry access as shown in Figure 5. The proposal would provide an opportunity to create a small scale residential development in a rural setting, but in close proximity to Peterculter with the ample services and facilities accesible within the village.

The development could provide the opportunity for self build, Scottish Planning Policy requests that Planning Authorities consider sites for people seeking self build-plots. This provides an opportunity for this type of development and will also contribute to meeting the housing land requirement.

As a part of the development there will be biodiversity improvements made to the surrounding area of woodland, the plans include restoration of large areas of the site and introduction of a wider variety of species increasing the habitat value of the area. There will also be replacement trees planted on other land owned by the proposer which will further compensate for any necessary felling associated with the development.

There is an existing walking route through the site and as a part of the proposals this would be enhanced with the potential for a new route to be created, this is highlighted in Figure 6 and would follow the desire paths currently in the site. This route would subsequently provide connection to Peterculter to the south and Milltimber to the east.



Figure 5: Former Quarry Access

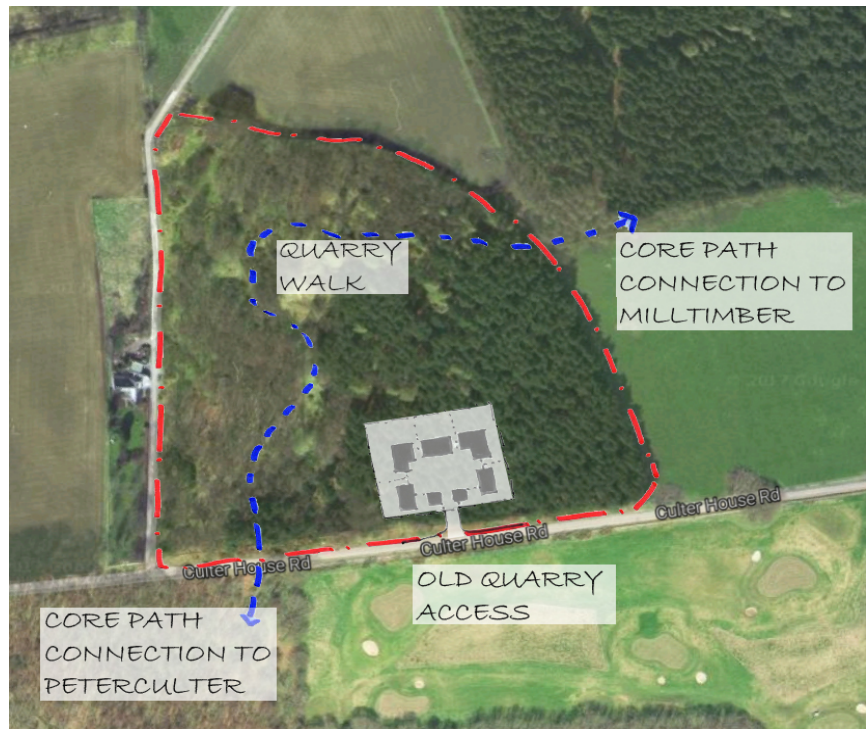


Figure 6: Site Plan Showing Access and Core Path Links

4 ANCIENT WOODLAND

Ancient Woodland has a number of policies and advice documents available which outline its position in planning providing guidance for developers. Nationally Ancient Woodland requires the planning system to protect and enhance semi-natural woodland (SPP, para 194). The policy further states that planning authorities should seek opportunity to create new woodland and plant native trees in association with a development (SPP, para 217). There is a presumption in favour of protecting woodland and removal should only be permitted where the development would have significant public benefit (SPP, para 218). In order to determine the acceptability of tree removal by any development, SPP refers developers to the 'Control of Woodland Removal Policy' which is prepared by the Forestry Commission.

This document echoes SPP stating that there is a strong presumption in favour of protecting Scotland's woodland resources. Despite this presumption, the Forestry Commission recognise that there are instances where woodland removal may be permitted. The policy outlines a number of guiding principles for the control of woodland removal, one states that, "*Woodland removal should be allowed only where it would achieve significant and clearly defined public benefits. In appropriate cases a proposal for compensatory planting may form part of this balance*" (Forestry Commission, p6). The policy then outlines five criteria where removal would be appropriate. Two of these criteria are -

- Enhancing priority habitats and their connectivity
- Enhancing populations of priority species

Further support for woodland removal is likely where doing so encourages recreational activities and public enjoyment of the outdoor environment. The Forestry Commission also outline advice on uneconomic woodlands, it states that "*A reduction in the area of woodland (as distinct from the type of woodland) will not be authorized unless there are clear, significant public benefits from doing so*" (Forestry Commission, p18).

Policy is also outlined at a more local level through the adopted Aberdeen City LDP, this addresses trees and woodland in policy NE5 which outlines that the Council will seek to protect and enhance trees and woodland. This enhancement of woodland is not clearly specified, however, it appears that in seeking to promote the creation of new woodland, planting of native trees in association with development would be viewed favourably. The Council also provide Supplementary Guidance on trees and woodland which expands upon policy NE5, this requires developers who are removing trees as part of a development to provide compensatory planting.

Nationally there is strong protection of trees to ensure they are protected and to promote the planting of trees in Scotland. Whilst there is a protection of woodland, this does not mean that any felling of trees will be dismissed, it appears that development of this type may be permitted if mitigation aligned with national and local policy is provided. These criteria ensure that any loss of woodland will be replaced or otherwise will provide some net public benefit.

Ancient Woodland is defined as land that is currently wooded and has been continually wooded since 1750, examination of the trees on site indicates that they do not date back to the 18th century. It is estimated that the conifers on the eastern portion are approximately 30 years old. Records from 1865-1872 indicate that the woodland on this site had been cleared at this time and the site was rough pasture, see Appendix 2.

A large portion of the eastern side of the site comprises a coniferous commercial plantation, the method of planting for this purpose ensures that trees grow tall and straight which is better for processing. Whilst there will be a requirement for trees to be felled, the housing has been sited on an area of coniferous woodland and would form part of a wider selective felling and replanting strategy. This strategy would provide compensatory planting as well as enhancing the biodiversity value of the site which can subsequently be enjoyed by the public who frequent the area on the desire paths through the woodland as well as supporting a diversity of insects increasing foraging opportunities.



Figure 3: Coniferous Woodland to East of Site

The vast majority of the woodland would remain untouched, other than by woodland management to improve its overall health. The proposed woodland management scheme would allow enhancements to be focused on species of trees and supporting vegetation which would improve the nature conservation site. Again, it is envisioned that this enhancement would provide net public gain for those who walk in the area and the complementary core path improvements would allow the realisation of this benefit. The trees on site have not been the subject of any management over recent years, therefore, the overall quality of the woodland will be greatly improved by selective felling. The proposed planting on formerly unplanted land will also offset the loss of woodland.



Figure 4: Aerial Image of Site and Links

5 MAIN ISSUES RESPONSE

The development bid at Guttrie Hill West was reviewed as part of the call for sites in Aberdeen City, the MIR recommended it be classified undesirable. Aberdeen City Council conduct their reviews against certain criteria and ultimately provide a score for the site out of 63 for each site. The scoring is purely indicative and whilst there is no pass mark for sites, it provides helpful feedback for allowing mitigation to be considered.

The scoring is conducted on a scale of 1-3 with 3 being desirable and 1 undesirable, utilising the scores issued for Albyn the mitigation required has been prioritised accordingly. The site scored 9 scores of 1 for the following reasons-

- Natural Conservation
- Landscape Features
- Landscape Fit
- Relationship to Existing Settlement
- Land Use Mix/ Balance/ Service Thresholds
- Accessibility
- Proximity to Facilities – Shopping/Health/Recreation

- Proximity of Employment Opportunities
- Other Constraints

These have been considered as the highest priority in this response and will individually be addressed with relevant mitigation provided to attempt to rectify the concerns of the Planning Officers.

Scores of 2 were issued for 4 further criteria, these were-

- Slope
- Direct Footpath/ Cycle Connection to Community
- Land Use Conflict
- Service Infrastructure Capacity

These points will also be individually addressed other than where there is opportunity to combine criteria and provide a singular response to address both headings.

Natural Conservation

It is acknowledged that the site sits within the Aberdeen City Green Belt, the development though would have no impact on the objectives of the Green Belt outlined in LDP policy NE2. Development has occurred within the Green Belt with limited impact, ensuring it delivers its role to protect the growth of settlements. The trees which would be felled to allow the development to proceed are trees which were planted following quarrying on the site for commercial purposes and the compensatory planting proposed here is far more sympathetic to the Ancient Woodland and surrounding tree mix.

The classification as Ancient Woodland has been dealt with in great detail in this report, policy at national and local level allows development so long as there is a net public benefit such as the encouragement of recreational activities and public enjoyment of the outdoor environment. The area at Guttrie Hill is already utilised by many locals who walk through the site, this is evidenced by the desire lines through the woodland. This proposal would enhance the core paths through the site and beyond which would naturally encourage the public to use the site for recreation. The felling of trees to allow the five houses to be developed would be compensated for on the site with the planting of native trees to improve the woodland in the area. This would consequently enhance the biodiversity on the site through the planting of trees highlighted in the MIR such as upland birch woodland.

Coupled with the potential to enhance the woodland on site would be a management scheme to better preserve and improve the health of the woodland on site. Currently there is no management scheme in place, however, the promoters of the site are keen to implement one should an allocation be obtained and development proceed. The LNCS would also be enhanced by the compensatory planting in the area as well as the proposed woodland management scheme.

The Environmental Walkover Survey conducted prior to the submission considered the risk to red squirrel to be acceptable, noting that whilst evidence was present of squirrel on the site it showed the animals merely used the site to commute through. The vast majority of the woodland would remain with compensatory planting also taking place to enhance the woodland. Replacement planting can include trees and other plants that provide improved habitat for red squirrels.

The contribution of Guttrie Hill to the areas natural setting is readily understood, the promoter of the site is very keen to enhance this through the aforementioned means. For this reason and the mitigation proposed, it is suggested that the Council should reconsider their assessment of the bid under the natural

conservation heading. Development will not damage this and could provide numerous benefits to the woodland which can subsequently be enjoyed by the public.

Landscape Features & Landscape Fit

The MIR highlights the woodland is a prominent feature in the area, this submission concurs with this. The proposal for the site retains the prominence through minimal felling of trees, the felling would primarily be done within the body of the woodland with the perimeter tree line remaining vastly intact. The public will likely not view the area of development readily with the surrounding woodland. The trees which are proposed for removal are the most suitable and compensatory planting will ensure that the area retains its woodland prominence and landscape features.

A sympathetic approach has been planned whereby the most appropriate area of the site has been identified to fell trees, with compensatory planting factored in to ensure the landscape impact is minimal. For these reasons, the Council should reconsider the impact of the development on the landscape features in the area for the development ensures that the landscape is afforded the highest priority and all desirable features are retained to the highest possible level.

Relationship to Existing Settlement

The site lies approximately 1km from the existing settlement of Peterculter, however, when considered against similar developments which have been undertaken in the village the distance is not excessive. Modern development to the north west of the settlement measure up to 1.2km from the neighbourhood centre.

It is acknowledged that the site is somewhat removed from the existing settlement but it provides a small opportunity for self-build close to community facilities.

Land Use Mix/ Balance/ Service Thresholds

It is acknowledged that the development is solely residential in nature, the scale of the development does not afford a lot of opportunity to provide a balance of uses. The site is frequently used by the public for recreational reasons though and it must be highlighted that the developer is enhancing this provision within the site. Enhancements to core paths as well as compensatory planting will encourage the public and provide them with a gain.

Whilst it is accepted that there are limited opportunities on the site to provide a broad mixture it is also suggested that the site is rather restricted in what it can provide given its size. The core path enhancements seek to deliver improved recreational facilities, but beyond that there is not a great deal can be done.

Accessibility

The nearest bus route is located approximately 1,200m from the site with stops at Johnston Gardens North and School Road. Bus routes provide access to the number 19 service which runs between Culter and Tillydrone and runs approximately every 15 minutes during peak times. The bus provision to the site is acknowledged as being slightly less than desirable, however, this must be tempered against the number of units proposed for the site. Providing a bus service for this limited number of dwellings would be disproportionate, given the rural setting of the proposal it should not be precluded on the lack of public transport. SPP17 states, "*Rural development may be permitted on social and economic grounds where regular and frequent public transport cannot be justified and where the impact of vehicle movements*

on the local road network would not be significant." It can therefore be seen, that a rural development should not be precluded due to a lacking bus service, the traffic impact of Guttrie Hill West would be minimal given the low number of dwellings.

The site is currently well connected to the core path network with route 76 to Peterculter and route 51 to the north to Garinhill Wood and onwards. Within Peterculter with the AWPR directly to the east, Aberdeen City Council are seeking to link a core path from Peterculter to Miltimber and there is an aspirational route shown within the Core Paths Plan. In conjunction with the proposal for Guttrie Hill (East) the proposals to create the core path connection and improved access can be created.

Whilst it is recognised that the road network to and from the site is not suitable for large scale development, that is not what is being proposed at Guttrie Hill West. Core paths to the north, west and south of the site provide good walking access to and from the site and further paths linking Milltimber to the east would make links excellent. Public transport is lacking, however, it would be unsuitable to implement a service to benefit just five houses. It is, therefore, considered that the Council should reconsider their assessment of the site.

Proximity to Facilities- Shopping/Health/Recreation

PAN 75 Planning for Transport deems a distance of under 1.6km acceptable as a walking distance to local facilities, the site at Guttrie Hill West fulfils this criteria. Notable distances which were measured to local facilities include-

- Primary School 1.5km
- Sport Centre 1.2km
- Nearest Shop 1km
- Doctors Surgery 1.5km

The development complies with national policy on the matter and the assessment is not consistent with scores for other bids in the area.

Proximity of Employment Opportunities

The village of Peterculter provides residents with limited employment opportunities, this concern is consistently raised especially by those who live in the village. The site at Guttrie Hill West unfortunately does not provide any employment opportunity given its nature and therefore would not contest the view of the Council regarding this heading.

Other Constraints

The MIR notes that there are recreational uses of the site the recreational value of the site is something which the promoter wishes to retain and ultimately enhance following a successful allocation. This point is illustrated by plans to locate a core path through the site and create links to other core paths at different sections of the site. The reality is that the residential development requires a small section of the site, the remainder of the site will be enhanced for recreational purposes to ensure public benefit.

The site was reviewed for radon level utilising the UK map, this classified the area of Guttrie Hill as intermediate with a level of 3%-5%. It must be noted that this submission appears to be the only site which has had this highlighted yet the entire village of Peterculter would fall into this classification. This point would again question the consistency of the approach of the Council, however, as it has been highlighted, it will be addressed by this submission. Any house design for the area would incorporate necessary steps such as protective membrane in building materials to mitigate any risk posed from radon.

Direct Footpath/ Cycle Connection to Community

This report has highlighted the wishes of the promoter to improve the footpath and cycling links with Peterculter neighbourhood centre. Core path 51 is highlighted in the MIR along the boundary of the site to the west, this links well with core path 76 which provides access to Peterculter. The submission further proposes a new core path, this would serve to connect Milltimber and Peterculter across the recently completed AWPR. This development would provide the community with significant recreational gain particularly those who have had their activities impacted by the bypass.

It would be put forth that the Council should reconsider this assessment of the site, the proposal has two existing core path connections and seeks to introduce another through the site to the benefit of the public and it is contested that the site should not be scored down as a result of this.

Land Use Conflict

The MIR notes that the site is a rural/agricultural area and the courtyard proposal has been proposed in recognition of the rural location to provide limited self-build opportunity.

Service Infrastructure Capacity

The MIR highlights schooling as an issue and subsequently marks the submission down as a result of this. The Council outline the primary and secondary provision for the site, Culter PS has more than adequate capacity to cope with development of five houses with forecasts suggesting the school will operate at 76% capacity in 2022. Secondary schooling would be provided by Culter Academy, this school is forecast to be slightly over capacity in 2022 at 104%. This point is acknowledged, however, it would be put forth that a new secondary school will be built as part of the ongoing Countesswells development. Further, the limited impact of a development of five houses should in the aforementioned circumstances would have insignificant impact.

6 CONCLUSION

This report has responded to the Aberdeen City Council MIR with specific reference to the submission at Guttrie Hill West. The MIR highlighted several constraints on the site assessment, however, it is considered that some of these are unjust whilst others can be suitably mitigated to allow the benefits of the proposal to be realised.

The opportunity for self-build units is considered to be an attractive proposal which is supported by SPP, this also provides the opportunity to contribute to the housing land requirement in Aberdeen.

The woodland which lies on the site provides an attractive landscape feature, this will remain and be enhanced by developing Guttrie Hill West. Compensatory planting of native trees to mitigate the limited number which must be removed will provide public gain. The area is frequented by people for recreational purposes and the promoter is keen to provide an area which the local residents can enjoy for this.

This submission has adapted to the feedback from the MIR and suitably addressed some of the concerns raised. Many of the points raised by the MIR are unjustly damning on the site which has the potential to offer a small opportunity for self-build with minimal negative effects. The mitigation provided has in some instances been highlighted previously, it is trusted that in reconsidering the site all points raised will be taken into account which will allow the potential benefits of the site to be envisioned and illustrate that these significantly outweigh any constraints.